

AO 91 (Rev. 11/11) Criminal Complaint

## UNITED STATES DISTRICT COURT

for the

Southern District of Texas

United States Courts  
Southern District of Texas

FILED

June 27, 2023

United States of America  
v.  
CHRISTOPHER DEBORDE

Nathan Ochsner, Clerk of Court

Case No. **4:23-mj-1309**

Defendant(s)

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of June 21, 2023 in the county of Austin in the  
Southern District of Texas, the defendant(s) violated:

Code Section

Offense Description

Title 18 U.S.C. 922(g)(1)

Possession of a Firearm by Previously Convicted Felon

This criminal complaint is based on these facts:

See Attached Affidavit

☐ Continued on the attached sheet.

Complainant's signature

SA Kevin Istre

Printed name and title

Sworn to before me telephonically.

Date: 06/27/2023

Judge's signature

City and state: Houston, Texas

United States Magistrate Judge Dena Palermo

Printed name and title

**4:23-mj-1309**

**AFFIDAVIT**

I, Special Agent Kevin Istre, affiant, being first duly sworn via telephone hereby depose and state the following:

1. That I am currently employed as a Special Agent with the Bureau of Alcohol, Tobacco and Firearms & Explosives (ATF) and have been so since 2014. Beginning in November 2004, I was a Police Officer with the City of Baton Rouge, Louisiana, where I served as a Task Force Agent with the Drug Enforcement Administration from July 2009 until May of 2014. During my career, I have investigated violations of Federal and State laws to include firearms and illegal substances.

2. During my employment as an ATF Special Agent, I have received specialized training regarding, and have personally participated in, various types of investigative activity, including, but not limited to, the following: (a) physical surveillance; (b) the debriefing of defendants, witnesses, informants and other individuals who have knowledge concerning violations of federal firearms laws; (c) undercover operations; (d) the execution of search warrants; (e) the consensual monitoring and recording of conversations; (f) electronic surveillance through the use of pen registers and trap and trace devices; (g) the court-authorized interception of both wire and electronic communications (i.e., Title III wiretaps); and (h) the handling and maintenance of evidence.

3. This Affidavit is made for the limited purpose of establishing probable cause in support of a Criminal Complaint alleging that **CHRISTOPHER DEBORDE** violated the following statutes:

- Title 18 U.S.C. Section 922(g)(1): Possession of a firearm by a person previously convicted of a felony

4. Since this Affidavit is for the limited purpose of establishing probable cause to support the Criminal Complaint, it contains only a summary of relevant facts. I have not included every fact known to me concerning the entities, individuals, and the events described in this Affidavit.

5. The statements made in this Affidavit are based in part on: (a) my personal participation in this investigation; (b) information provided to me by other law enforcement officers; (c) interviews and records of involved parties; and (d) the training and experience of myself and other law enforcement agents and officers.

**FACTS LEADING TO THE SEIZURE OF FIREARMS FROM CHRISTOPHER DEBORDE**

6. Your Affiant reviewed the reports and body worn camera as well as speaking to members of law enforcement and learned that on June 21, 2023, at approximately 21:50 hrs., officers of the Sealy Police Department contacted a suspicious person, later identified as **CHRISTOPHER DEBORDE**, behind a closed business located at 2340 Highway 36S, in the city of Sealy, county of Austin in the Southern District of Texas. During a consensual encounter, **CHRISTOPHER DEBORDE** admitted to officers that he was looking through the dumpster. **CHRISTOPHER DEBORDE** further advised officers that he was a convicted felon, having been to prison for possession of an unregistered destructive device. **CHRISTOPHER DEBORDE** further admitted to officers to possessing ammunition, firearms and identification cards which did not belong to him in his vehicle.

**CHRISTOPHER DEBORDE** claimed he was in possession of the listed items due to his ongoing work with law enforcement.

7. Based on the statements and plain view observations (AR style rifle/pistol laying on the floorboard), a probable cause search of the vehicle of **CHRISTOPHER DEBORDE**, a 2017 Ford F-250 with Texas license plate JNN6479, was conducted. Officers seized the following firearms, as described by the Sealy Police Department: Savage Arms rifle with Serial Number G261954, Springfield AR-15 style rifle/pistol with Serial Number ST218516, and a (HS Produkt) Springfield XD 9mm pistol bearing serial number GM733745.

**CHRISTOPHER DEBORDE CRIMINAL HISTORY AND INTERSTATE NEXUS OF FIREARM(S)**

8. **CHRISTOPHER DEBORDE** was convicted in the Western District of Texas in 2019 from an incident in 2018 for Possession of an Unregistered Destruction Device, which he received a sentence of fifteen (15) months in the custody of the Federal Bureau of Prisons (time served) and thirty-six (36) months of federal supervised release.

9. The affiant knows from his training and his experience, along with consultation of Agents trained in the determination of Firearms Interstate Nexuses, HS Produkt does not manufacture firearms in Texas. Any firearm manufactured by HS Produkt and seized in Texas travelled in or affected interstate commerce.

10. Due to the facts outlined above and to the best of your affiant's knowledge and belief, all statements made in this affidavit are true and correct. Based on these facts, your affiant believes probable cause exists for the issuance of an arrest warrant for the person of **CHRISTOPHER DEBORDE** in the possession of a firearm by a person previously convicted of a felony in violation of Title 18 U.S.C. Section 922(g)(1).



Kevin Isre  
Special Agent, ATF

The foregoing affidavit was sworn to telephonically on this 27th day of June, 2023  
and I find probable cause.



HONORABLE DENA PALERMO  
U. S. Magistrate Judge